

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

RED BARN MOTORS, INC.)	CASE NO. 1:14-cv-01589-TWP-DKL
BARBARA A. RICHARDSON)	
and DONALD B. RICHARDSON)	
)	
Plaintiffs,)	
)	
vs.)	
)	
LOUISIANA'S FIRST CHOICE)	
AUTO AUCTION, L.L.C. and)	
NEXTGEAR CAPITAL, INC.,)	
)	
Defendants.)	

MOTION TO CONTINUE INITIAL PRETRIAL CONFERENCE

The Defendant, Nextgear Capital, Inc. ("Nextgear"), by counsel, respectfully requests this Court to reschedule the initial pretrial conference, and in support of this Motion, states:

1. The Court has set this matter for an initial pretrial conference on March 3, 2015, at 11:00 a.m.
2. Counsel for Nextgear, Steven D. Groth, will be out of the country on his honeymoon during the week of March 2 through March 6, and will be unavailable to attend the initial pretrial conference.
3. Also, counsel, David Jurkiewicz, is scheduled to attend a bench trial in the case of *JPMC Specialty Mortgage, LLC f/k/a WM Specialty Mortgage, LLC v. Richard Allison, et al.*, Marion Superior Court 2, Cause No. 49D05-0709-MF-041311.
4. The undersigned has contacted all counsel of record and they have no objection to the requested continuance.

5. Counsel and the Court have indicated their availability for the hearing on April 6, 2015, at 9:00 a.m.

WHEREFORE, Defendant, Nextgear Capital, Inc., by counsel, requests a continuance of the March 3, 2015, initial pretrial conference, to reset the pretrial conference for April 6, 2015, at 9:00 a.m. EST and for all other relief proper in the premises.

Respectfully submitted,

/s/ Steven D. Groth

Steven D. Groth (17643-71)

David J. Jurkiewicz (18018-53)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following counsel of record via first class, United States mail, postage prepaid, this 10th day of February, 2015:

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/s/ Steven D. Groth

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